

# Exhibit 2

**ANDREA BUTTROSS - December 10, 2024**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

KAREN LESTER,	)	
	)	
	)	
Plaintiff,	)	
	)	
V.	)	Case No. 2:23-cv-00624
	)	
	)	
WILEY COLLEGE,	)	
	)	
	)	
Respondents.	)	
_____	)	(JURY DEMANDED)

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ZOOM VIDEOTAPED DEPOSITION OF ANDREA BUTTROSS  
Tuesday, December 10th, 2024

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A P P E A R A N C E S

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**ANDREA BUTTROSS - December 10, 2024**

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I N D E X

WITNESS FOR THE PEOPLE:	PAGE
ANDREA BUTTROSS	
Direct Examination by MR. DOYLE.....	4
Cross-Examination by MS. GEZAHAN.....	34
Redirect Examination by MR. DOYLE.....	45

**ANDREA BUTTROSS - December 10, 2024**

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I N D E X (continued)		
E X H I B I T S		
Description		
Exhibit 4	.....	Page 29
(Letter)		

**ANDREA BUTTROSS - December 10, 2024**

1 THE VIDEOGRAPHER: Today is Tuesday,  
2 December 10th, 2024. We're on the record at 9:03 a.m.

3 ANDREA BUTTROSS,  
4 Called as a witness on behalf of the Plaintiff  
5 herein, after having been first duly sworn,  
6 testified as follows:

7 THE WITNESS: I do.

8 DIRECT EXAMINATION

9 BY MR. DOYLE:

10 Q. Tell us your name please, ma'am.

11 A. Andrea Buttross.

12 Q. You work for the Louisiana Department of Public  
13 Safety and Corrections?

14 A. Yes, sir.

15 Q. What do you do there?

16 A. So, currently, I serve as the deputy assistant  
17 secretary with reentry, education, and chaplaincy  
18 services.

19 Q. And what does that mean generally you're in  
20 charge of when you tell people that?

21 A. We oversee all of our reentry, education, and  
22 chaplaincy programs in all of our State prisons, which  
23 we have eight. And then also in our parish cells that  
24 are overseen by the sheriffs in the area in which the  
25 jail is; however, we provide support and we do auditing

**ANDREA BUTTROSS - December 10, 2024**

1 Second Chance Pell Experiment?

2 A. Yes, sir.

3 Q. What is a Second Chance Pell?

4 A. So that is -- a Second Chance Pell was an  
5 experimental site initiative, through the USDOE, that  
6 allowed for inmates housed in state facilities to be  
7 provided a Pell grant for their education.

8 So the colleges that were accepted into the  
9 experimental sites initiative had to be accepted and go  
10 through the process with the USDOE, and then they  
11 worked specifically with that state. So basically it  
12 allowed for us to offer degree programs utilizing Pell  
13 grants in our state facilities which we had not been  
14 able to do before.

15 Q. You called something called the "USDOE," that's  
16 the Department of Education? The Federal --

17 A. Yes. I'm sorry. We use acronyms. I'm going to  
18 try to not. That's the United States Department of  
19 Education.

20 Q. And you also mentioned something about Pell  
21 grant, what is a Pell grant?

22 A. So a Pell grant -- if a person meets specific  
23 qualifications, a person -- a free person or an inmate  
24 is allowed to receive these grant dollars that pay for  
25 a percentage of their education. So, technically, like

**ANDREA BUTTROSS - December 10, 2024**

1 education for the inmates?

2 A. So the way that it worked is the university was  
3 to provide a person -- so a part time or a full-time  
4 person at each of our facilities that would meet with  
5 inmates, counsel them, provide any information that is  
6 needed for course enrollment, basic, like, college  
7 services that they would need to have access to. They  
8 would provide that person.

9 They would also provide and pay for the  
10 technology. We used a provider called Atlo Software.  
11 Atlo Software is our education provider -- education  
12 technology provider. So they provide the technology in  
13 all of our facilities around the state.

14 Ashland worked directly with them to make sure  
15 that the learning management system was safe, was a  
16 safe environment for our population, and then Ashland  
17 administered those courses to the inmates. They met  
18 with them. They had a site director, is what they  
19 called it, at each of our facilities, whether it be  
20 part time or full time.

21 They also had a Louisiana state director. So  
22 the Louisiana state director was responsible and  
23 supervises each of the state directors in the  
24 facilities, make sure that they are trained, make sure  
25 that things gets disbursed to them in an appropriate

**ANDREA BUTTROSS - December 10, 2024**

1 Q. I'm going to share with everybody -- and I've  
2 put it in the chat, if you want to download it. What's  
3 been marked as plaintiff Exhibit 4, a letter dated  
4 February 6th, 2023, from Mr. James Vaunght (phonetic).  
5 It looks like you're copied. Do you recognize this  
6 letter?

7 A. Yes.

8 Q. How did this letter come about?

9 A. This -- I actually wrote this letter. This  
10 letter came about from our constant issues and lack of  
11 communication with Wiley. We had asked for things. We  
12 had asked for more site visits with our inmates.

13 I went out to Raymond Laborde Correctional  
14 Center one time to visit with the Wiley students  
15 because there had been so many letters that were sent  
16 to my office, and I went out and met with them and our  
17 students sat there and told me that we are not getting  
18 a lot of communication. We don't even know what  
19 classes we have to take. We don't know how many  
20 classes we have to take to graduate. We're being told  
21 we're going to graduate, and then being told we're not,  
22 you know, a month later.

23 And at that point, I told them, I said, I am  
24 so sorry and this is not appropriate. And it's not  
25 going to happen again. And so we took that into our



ANDREA BUTTROSS - December 10, 2024

1 one?

2 Q. Sure. Let's try it this way. Let's talk about  
3 the first one.

4 A. Okay.

5 Q. What experience in delays providing safe courses  
6 to participants while Wiley was involved in this Second  
7 Chance Pell Program?

8 A. So the problems with the delay in the site  
9 courses is that by the time the inmates were enrolled  
10 in the course they were specifically taking, they were  
11 already behind in the class. So some of the other  
12 classmates may have been enrolled for two, three, four  
13 weeks, and this inmate is being told that they are  
14 supposed to be enrolled in this class, our site  
15 director is telling us that they are supposed to be  
16 enrolled in this case, and they still are not.

17 Q. The second you've identified was, inaccurate  
18 reporting, student transcripts, student status. What  
19 can you tell us about that?

20 A. That is correct. So I believe on numerous  
21 occasions there were inmates' transcripts who didn't  
22 show classes that they had already taken. And the  
23 students were able to provide us more information to  
24 verify that that was indeed accurate and that they had  
25 taken courses that were not showing up on their

ANDREA BUTTROSS - December 10, 2024

1 transcript in which Wiley was telling them that they  
2 would have to take again.

3 So just a lot of discrepancies in what was  
4 taken, what had been taken, what their graduation date  
5 would be, all based on the courses that were required.

6 Q. The third item is failure to provide  
7 participants with formal letters notifying of status  
8 changes or other information that is pertinent to  
9 completing their degree. What does that mean?

10 A. So -- and I kind of mentioned this earlier, but  
11 when I went out there, the students had not been  
12 provided much information on -- some of them were like,  
13 I'm supposed to graduate in January, or whatever month  
14 it may have been, however, they're telling me that I'm  
15 not eligible to graduate. But here's the list of  
16 classes that I was supposed to take, and I've taken all  
17 of them.

18 We requested that, you know, early on that  
19 they provide more formal information to the students so  
20 that they were aware of what was expected of them. And  
21 we never could get them to provide that information to  
22 the inmates.

23 Q. The fourth item is, unavailably required courses  
24 for participants to complete degree plan. What do you  
25 mean by that?

ANDREA BUTTROSS - December 10, 2024

1 A. So I believe there was a situation, if I can  
2 recall, a few where inmates were very, very close to  
3 release and they needed one course in order to  
4 graduate, and they may have been released within six  
5 months. And Wiley would say, Oh, we're not offering  
6 that course right now. So they're going to have to  
7 wait until the next enrollment period, or maybe two  
8 enrollment periods to where they can actually take that  
9 course.

10 Q. The fifth item, lack of in-person visits and  
11 planning for such. Why was that a concern?

12 A. So as I mentioned earlier, it's really important  
13 for the colleges to be hands on, to show face, to let  
14 the students know that they support them and that the  
15 content that they're receiving is accurate.

16 And trust, a trust issue, you know, a lot of  
17 our students didn't trust the information that they  
18 were getting from Wiley. And that was told to me  
19 directly by our students. And that was at the point  
20 where I said, y'all have got to come. You have got to  
21 make regular visits. We can't continue this  
22 communicating via e-mail, you know, once every few  
23 months. The students need to see you. So that is  
24 where that came from.

25 Q. The sixth thing you indicated sounded similar.

**ANDREA BUTTROSS - December 10, 2024**

1 Lack of monthly meetings with site coordinators, and  
2 training. Why was that a problem?

3 A. So they were not taking place. They were  
4 supposed to be taking place. We were told that they  
5 would for a very long time.

6 Now, I will say that they had a lot of turn  
7 over the course of the years that we worked with them,  
8 so I assume that a lot of it was a lack of  
9 communication between, you know, changing hands.

10 And so -- it's important because our staff has  
11 to be trained. They have to know what's going on at  
12 Wiley. They have to know if there's class updates,  
13 curriculum updates, anything that is important to the  
14 student.

15 You know, our -- the part-time staff that are  
16 working in these capacities, they've never worked at a  
17 college. They don't know all of the financial aid  
18 details. They don't know all of the information about  
19 a learning management system, and course requirements,  
20 and degree requirements; and so it was really important  
21 that they stay informed, and they did not stay  
22 informed.

23 Q. The seventh item, delay in deploying Atlo  
24 devices. Those are the laptop devices that you were  
25 talking about?

ANDREA BUTTROSS - December 10, 2024

1 A. That's correct.

2 Q. How was that an issue?

3 A. That was -- I feel like we talked about it for a  
4 year. A lot of it was their communication. You know,  
5 I would send an e-mail and say, Hey, let's have a  
6 meeting with Atlo. You know, we need to get the ball  
7 rolling. That they were, I believe, using APDS  
8 devices, which is another education technology  
9 provider; and that stands for American Prison Data  
10 Systems. I believe they've since then changed their  
11 name though.

12 And APDS devices just were not working well.  
13 So we had the agreement that we switch all of the  
14 devices to Atlo devices. And we could never get the  
15 ball rolling. You know, it had to be -- we can make  
16 that connection, but the college is the one who's  
17 responsible for the learning management system that  
18 goes on the device. So if they don't work with Atlo  
19 and us in that capacity, then the device is essentially  
20 useless.

21 Q. Number eight, documentation from Wiley College  
22 to ensure their practice to comply with the U.S.  
23 Department of Education funding deadlines. What's that  
24 about?

25 A. Let me read that one again. So I believe in

ANDREA BUTTROSS - December 10, 2024

1 this situation we were concerned about our students who  
2 may have been removed from the course for various  
3 reasons, however, had stayed enrolled Wiley's system  
4 for way longer than should had been, and when we  
5 questioned it, they would say that it would be taken  
6 care of, and I believe it continued to happen.

7 And we got really concerned that they were  
8 collecting Pell grants for inmates that weren't  
9 enrolled at that time. So that was one of the things  
10 that we were very worried about because it kind of was  
11 a continuous thing, and I believed the way -- that the  
12 way that the U.S. Department of Ed works is that if a  
13 student -- a student has to stay enrolled for a certain  
14 percentage of time, or the money has to be repaid to  
15 the Federal government. So we got very worried that  
16 that was not being done accurately, being that the list  
17 never really matched who was actually enrolled.

18 Q. So what would be the problem with collecting  
19 money from the Federal government if the student's not  
20 enrolled?

21 A. Well, I think it's illegal.

22 Q. How so?

23 A. Because I believe that the -- I'm not going to  
24 quote it, because I'm not that sure. But I believe  
25 that the law says that for a Pell grant if an inmate --

**ANDREA BUTTROSS - December 10, 2024**

1 days -- if that's what they got -- their disciplinary  
2 was then we would typically remove them from the  
3 course. They would have to be exited if they were  
4 dropped for disciplinary. So, yes, so, I mean, that is  
5 definitely something that we do. We would not keep  
6 them enrolled in a class.

7 Q. Okay. As far as the tablets, I know you say  
8 maybe Ms. Leewright would know more about this. Your  
9 time as a director, Wiley was providing the students  
10 with tablets, or did they transition to laptops?

11 A. So they were using APDS tablets --

12 Q. Uh-huh.

13 A. When I was transitioning is when we had been  
14 having conversations with Atlo and Wiley. Atlo is the  
15 one that provides the launch books, so the laptops.  
16 And I don't know that that ever actually transpired. I  
17 knew that there was a lot of communication. We talked  
18 money. We talked implementation, all of that. I'm not  
19 sure if it ever actually happened.

20 Q. And when did you start transitioning into your  
21 next role? What year was that?

22 A. 2022.

23 Q. The beginning or --

24 A. The beginning.

25 Q. Okay. And as you were talking about the APDS

ANDREA BUTTROSS - December 10, 2024

1 laptop tablets, what was -- were they broken, or was it  
2 an issue with compatibility? What was the issue?

3 A. So I think it may have differed at each  
4 facility. I think David Wade may have had a little bit  
5 of connectivity issues. The issues at Raymond Laborde  
6 were a lot of the courses not being uploaded, and I  
7 think they may have had this issue a little bit at Wade  
8 too.

9 But a lot of issues with the management  
10 system, with APDS and with classes being uploaded and  
11 updated, and whatever else is done on the back end,  
12 that did cause a lot of issues.

13 Q. Okay. And then the connectivity issue, we're  
14 talking about the Internet?

15 A. Okay.

16 Q. I'm asking. Sorry.

17 A. Oh, yes. I do believe that there were some  
18 connective -- David Wade is in the middle of nowhere.

19 Q. Okay.

20 A. I normally lose service on my phone when I go  
21 there.

22 Q. Okay.

23 A. So I do think that there were some challenges  
24 there. I think they ended up working them out, but,  
25 yeah, that was something that was a challenge.



**ANDREA BUTTROSS - December 10, 2024**

REPORTER'S CERTIFICATE

The transcript in the above-captioned case was produced from my stenographic notes taken in my capacity as Registered Professional Reporter, County El Paso, State of Colorado, at the time and place above set forth.

Dated at Colorado Springs, Colorado, this 19th day of February 2025.

/S/ Janice Broussard

Janice Broussard, CSR, RPR